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February 23, 2022

VIA ECF – EXHIBITS FILED UNDER SEAL

Honorable Lorna G. Schofield
United States District Judge
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

RE: *Contant, et al. v. Bank of America Corp., et al.*, No. 17-cv-3139

Dear Judge Schofield:

Pursuant to the Court’s Order of February 17, 2022, (ECF 571), Class Counsel write to report on our efforts to contact Mr. Owens to discuss the concerns set forth in his letter to the Court dated February 16, 2022. (ECF 570) In sum, Mr. Owens’ concerns have been fully resolved and neither Class Counsel nor Mr. Owens believe that any further action is required, subject to the Court’s direction.

In response to the Court’s Order, on February 18, 2022, Class Counsel transmitted a detailed letter to Mr. Owens. (*See, Ex. A*) Class Counsel attempted to address each of Mr. Owens’ concerns by providing detailed explanations and supporting documentation which was provided in a ZIP file and at a hosted Sharefile. *Id.* Class Counsel also proposed a follow-up telephone call, as needed. *Id.* On Monday, February 21, 2022, Class Counsel telephoned Mr. Owens to determine if he wished to discuss any of his concerns in view of Class Counsel’s February 18, 2022 letter. At that time, he did not. (*See, Ex. B*) Later, on February 21, Mr. Owens indicated that no further discussion was necessary. (*See, Ex. C*)

We welcome any questions the Court may have.

Respectfully submitted,

/s/ Michael Dell’Angelo
Michael Dell’Angelo

cc: Mr. Edward Owens (via email and regular mail)